



SIDLEY AUSTIN LLP
1501 K STREET, N.W.
WASHINGTON, D.C. 20005
(202) 736 8000
(202) 736 8711 FAX

pmoates@sidley.com
(202) 736 8175

BEIJING
BRUSSELS
CHICAGO
DALLAS
FRANKFURT
GENEVA
HONG KONG
HOUSTON
LONDON

LOS ANGELES
NEW YORK
PALO ALTO
SAN FRANCISCO
SHANGHAI
SINGAPORE
SYDNEY
TOKYO
WASHINGTON, D.C.

FOUNDED 1888

233 727.
233728

January 25, 2013

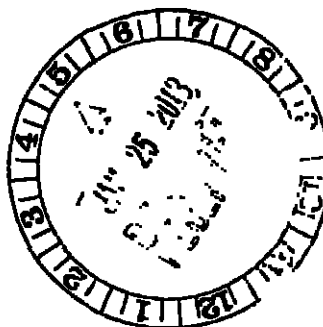
By Hand-Delivery

Rachel D. Campbell, Director
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

ENTERED
Office of Proceedings

JAN 25 2013

Part of
Public Record



Re STB Docket No. 42125, *E I DuPont de Nemours & Company v Norfolk Southern Railway Company*,
STB Docket No. 42130, *SunBelt Chlor Alkali Partnership v Norfolk Southern Railway Company*

Dear Ms. Campbell

This letter refers to the Reply Evidence filed by Norfolk Southern Railway Company ("NS") in the above-captioned Stand-Alone Cost ratemaking proceedings on November 30, 2012 and January 7, 2013, respectively. In preparing the operating plans posited by NS for the SARRs in those cases, NS utilized a computer program called "MultiRail." As NS explained, MultiRail is a modeling tool that facilitates the development of car blocking and train service plans for "carload" traffic, based upon a railroad's traffic, network configuration and customer service requirements.¹

MultiRail is commercially available from its developer, Oliver Wyman. As indicated in NS' Reply Evidence, NS has arranged with Oliver Wyman for the Board to have access to MultiRail, at no cost to the Board, in connection with the above-captioned rate cases. Specifically, NS has arranged with Oliver Wyman for that company to provide a copy of the MultiRail program, loaded on a laptop computer, for the Board's use in evaluating NS's Reply Evidence (and any related Rebuttal Evidence that Complainants might file). The software provided by Oliver Wyman will be fully functional, enabling the Board both to review and verify

¹ See Docket No. 42125, *E I DuPont de Nemours & Company v. Norfolk Southern R. Co.* ("DuPont v NS"), Reply Evidence filed November 30, 2012 at 157-167; Docket No. 42130, *Sunbelt Chlor Alkali Partnership v Norfolk Southern R. Co.* ("Sunbelt v NS"), Reply Evidence filed January 7, 2013 at 121-131.



Rachel D. Campbell
January 25, 2013
Page 2

MultiRail-related evidence, and should it desire to do so, to make adjustments to such evidence to reflect the Board's resolution of any evidentiary disputes regarding the data and assumptions utilized by the parties in their respective submissions. The MultiRail software will be delivered to the Board following execution of Oliver Wyman's customary licensing agreement, which we anticipate being able to provide to you early next week.

If you have any questions regarding the foregoing, please contact the undersigned counsel for NS

Sincerely,

A handwritten signature in black ink, appearing to read "G. Paul Moates".

G. Paul Moates
Terence M. Hynes

GPM/TMH:aat
Enclosures
cc: Jeffrey O. Moreno, Counsel for Complainants